

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M.
Williams,
Magistrate Judge

**NOTICE OF THE ZHP PARTIES' MOTION FOR PROTECTIVE ORDER
PRECLUDING DEPOSITIONS OF CERTAIN EMPLOYEES**

To: Adam M. Slater, Esquire
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PLEASE TAKE NOTICE that on a date to be decided after January 20, 2021, the ZHP Parties, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for an ORDER precluding depositions of certain employees.

January 20, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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